

FRED W. ALVAREZ  
MARINA C. TSATALIS  
GARY M. GANSLE  
KORAY J. BULUT  
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650 Page Mill Road  
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ADRIAN T. DELMONT (AD-7010)  
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12 East 49<sup>th</sup> Street  
New York, NY 10017  
Telephone: (212) 999-5800  
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*Attorneys for Defendants,*  
GOOGLE, INC. AND TIMOTHY  
ARMSTRONG

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL,

Plaintiff

GOOGLE, INC. and TIMOTHY ARTMSTRONG,  
Defendants.

Case No. 05 CV 6487 (DLC)

Doc. 9

**NOTICE OF MOTION FOR ADMISSION  
*PRO HAC VICE***

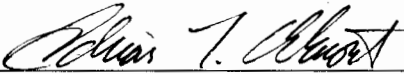
PLEASE TAKE NOTICE that upon the annexed declaration of Adrian T. Delmont and all exhibits appended thereto, Defendants Google, Inc. and Timothy Armstrong (collectively "Defendants"), will move the Court before the Honorable Denise Cote, United States District Judge, United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order pursuant to Local Civil Rule 1.3 admitting Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq.,

Gary M. Gansle, Esq., and Koray J. Bulut, Esq., to appear *pro hac vice* in the above-captioned action on behalf of Google, Inc. and Timothy Armstrong.

PLEASE TAKE FURTHER NOTICE that Defendants' motion is made on submission and that no party should appear before the Court on this motion.

Dated: New York, New York  
September 2, 2005

WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION

By:   
Adrian T. Delmont (AD-7010)  
12 East 49<sup>th</sup> Street, 30<sup>th</sup> Floor  
New York, NY 10017-8203

**TO: SULLIVAN & WORCESTER, LLP**  
Ilene Robinson Sunshine, Esq.  
One Post Office Square  
Boston, MA 02109

FRED W. ALVAREZ  
MARINA C. TSATALIS  
GARY M. GANSLE  
KORAY J. BULUT  
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*Attorneys for Defendants,*  
GOOGLE, INC. AND TIMOTHY  
ARMSTRONG

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL,

Plaintiff

v.

GOOGLE, INC. and TIMOTHY ARTMSTRONG,

Defendants.

Case No. 05 CV 6487 (DLC)

**ORDER GRANTING *PRO HAC VICE* ADMISSIONS  
OF FRED W. ALVAREZ, MARINA C. TSATALIS,  
GARY M. GANSLE, KORAY J. BULUT**

THIS MATTER having been brought before the Court by Defendants Google, Inc. and Timothy Armstrong, for an order pursuant to Local Civil Rule 1.3 admitting Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq. to appear and participate *pro hac vice* in this action of behalf of Defendants, and for good cause shown;

IT IS on this \_\_\_\_\_ day of September, 2005;

ORDERED that Fred W. Alvarez, Esq., being a member in good standing of the bars of the State of California, the District of Columbia and the State of New Mexico, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Marina C. Tsatalis, Esq., being a member in good standing of the bars of the State of California, the State of Pennsylvania, and the State of New Jersey, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Gary M. Gansle, Esq., being a member in good standing of the bar of the State of California, be permitted to appear *pro hac vice* in the above-captioned matter; and it is further

ORDERED that Koray J. Bulut, Esq., being a member in good standing of the bars of the State of California and the State of Minnesota be permitted to appear *pro hac vice* in the above-captioned matter.

---

Honorable Denise Cote  
United States District Judge

FRED W. ALVAREZ  
MARINA C. TSATALIS  
GARY M. GANSLE  
KORAY J. BULUT  
WILSON SONSINI GOODRICH & ROSATI  
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*Attorneys for Defendants,*  
GOOGLE, INC. AND TIMOTHY  
ARMSTRONG

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL,

Plaintiff

v.

GOOGLE, INC. and TIMOTHY ARTMSTRONG,

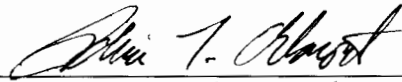
Defendants.

Case No. 05 CV 6487 (DLC)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 2, 2005, I caused Defendants' Notice of Motion for Admission *Pro Hac Vice*, dated September 2, 2005, Declaration In Support of Motion for Admission *Pro Hac Vice*, dated September 2, 2005, and [Proposed] Order Granting *Pro Hac Vice* Admissions of Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq., dated September 2, 2005, to be dispatched via Federal Express to the following attorney:

Ilene Robinson Sunshine, Esq.  
SULLIVAN & WORCHESTER, LLP  
One Post Office Square  
Boston, MA 012109

A handwritten signature in cursive script, appearing to read "Adrian T. Delmont", is written over a horizontal line.

Adrian T. Delmont

FRED W. ALVAREZ  
MARINA C. TSATALIS  
GARY M. GANSLE  
KORAY J. BULUT  
WILSON SONSINI GOODRICH & ROSATI  
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*Attorneys for Defendants,*  
GOOGLE, INC. AND TIMOTHY  
ARMSTRONG

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTINA ELWELL,

Plaintiff

v.

GOOGLE, INC. and TIMOTHY ARMSTRONG,

Defendants.

Case No. 05 CV 6487 (DLC)

**DECLARATION OF ADRIAN DELMONT  
IN SUPPORT OF MOTION FOR ADMISSION  
*PRO HAC VICE***

I, Adrian T. Delmont, declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an associate at the law firm of Wilson Sonsini Goodrich & Rosati, attorneys for the Defendants Google, Inc. and Timothy Armstrong (collectively, "Defendants") in the above-captioned action. I was admitted to practice before this court on January 20, 2004.

2. I submit this declaration in support of Defendants' motion for the *pro hac vice* admissions of Fred W. Alvarez, Esq., Marina C. Tsatalis, Esq., Gary M. Gansle, Esq., and Koray J. Bulut, Esq.

3. Mr. Alvarez is a Member of the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California, the District of Columbia and the State of New Mexico.

4. Mr. Alvarez has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.

5. Attached hereto as Exhibit A are Certificates of Good Standing for Mr. Alvarez from the State Bar of California, the District of Columbia Court of Appeals, and the Supreme Court of New Mexico issued within thirty days of this Declaration.

6. Ms. Tsatalis is a Member of the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California, the State of New Jersey and the State of Pennsylvania.

7. Ms. Tsatalis has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and she has assured me that she shall comply therewith.

8. Attached hereto as Exhibit B are Certificates of Good Standing for Ms. Tsatalis from the State Bar of California, the Supreme Court of Pennsylvania, and the Supreme Court of New Jersey issued within thirty days of this Declaration.

9. Mr. Gansle is an Associate at the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bar of the State of California.

10. Mr. Gansle has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.



11. Attached hereto as Exhibit C is a Certificate of Good Standing for Mr. Gansle from the State Bar of California, issued within thirty days of this Declaration.

12. Mr. Bulut is an Associate at the firm of Wilson Sonsini Goodrich & Rosati in Palo Alto, California, and, upon information and belief, is a member in good standing of the bars of the State of California and the State of Minnesota.

13. Mr. Bulut has read and is familiar with the standards for professional conduct imposed upon the members of the New York Bar, and he has assured me that he shall comply therewith.

14. Attached hereto as Exhibit D are Certificates of Good Standing for Mr. Bulut from the State Bars of California and the Supreme Court of Minnesota issued within thirty days of this Declaration.

15. Defendants respectfully requests that Fred Alvarez, Esq., Marina Tsatalis, Esq., Gary Gansle, Esq., and Koray Bulut, Esq. be granted admission *pro hac vice* in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
September 2, 2005



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Adrian T. Delmont (AD-7010)



THE  
STATE BAR  
OF CALIFORNIA


180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

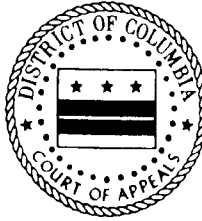
August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, FRED WILLIAM ALVAREZ was admitted to the practice of law in this state by the Supreme Court of California on December 23, 1975; that from the date of admission to January 1, 1981, he was an ACTIVE member of the State Bar of California; that on January 1, 1981, he transferred at his request to the INACTIVE status; that from that date to January 23, 1989, he was an INACTIVE member of the State Bar of California; that on January 23, 1989, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

  
Waffa N. Salfiti  
Custodian of Membership Records



**District of Columbia Court of Appeals**  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

FRED W. ALVAREZ

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was on the 12<sup>TH</sup> day of APRIL, 1989

duly qualified and admitted as an attorney and counselor. This attorney is, on the date indicated below, voluntarily registered as an inactive member in good standing of the District of Columbia Bar and, therefore, is not currently eligible to practice law in the District of Columbia.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 25, 2005.

GARLAND PINKSTON, JR., CLERK

By:

A handwritten signature in cursive script, appearing to read "C. Jackson", written over a horizontal line.

Deputy Clerk





THE  
STATE BAR  
OF CALIFORNIA

---

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MARINA CAROL TSATALIS was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1995; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti  
Custodian of Membership Records



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Marina C. Tsatalis, Esq.***

**DATE OF ADMISSION**

***December 17, 1992***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal  
Dated: August 24, 2005

\_\_\_\_\_  
John W. Person Jr.  
Deputy Prothonotary

# Supreme Court of New Jersey

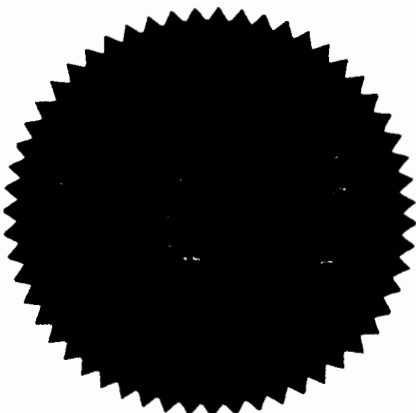


## Certificate of Good Standing

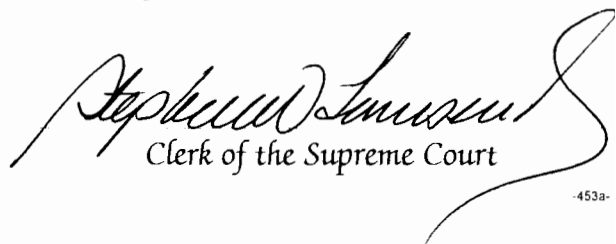
This is to certify that **MARINA C TSATALIS**  
(No. **018481992** ) was constituted and appointed an Attorney at Law of New  
Jersey on **December 22, 1992** and, as such,  
has been admitted to practice before the Supreme Court and all other courts of this State  
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in  
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"  
if the Court's records reflect that the attorney: 1) is current with all assessments  
imposed as a part of the filing of the annual Attorney Registration Statement, including,  
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client  
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not  
resigned from the Bar of this State; and 4) has not been transferred to Disability  
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's  
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to  
practice law in this State.*



In testimony whereof, I have  
hereunto set my hand and  
affixed the Seal of the  
Supreme Court, at Trenton, this  
**24TH** day of **August**, 2005

  
Clerk of the Supreme Court



THE  
STATE BAR  
OF CALIFORNIA

---

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, GARY MICHAEL GANSLE was admitted to the practice of law in this state by the Supreme Court of California on May 18, 1999; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Waffa N. Salfiti  
Custodian of Membership Records





THE  
STATE BAR  
OF CALIFORNIA

---

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

August 4, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KORAY JAMES BULUT was admitted to the practice of law in this state by the Supreme Court of California on April 2, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

  
Waffa N. Salfiti  
Custodian of Membership Records

**STATE OF MINNESOTA  
IN SUPREME COURT**

*Certificate of Good Standing*

This is to certify that the following attorney is in good standing.

KORAY JAMES BULUT

was duly admitted to practice as an attorney and counselor at law in all the courts of this state on

*October 25, 2002*

Given under my hand and seal of this court on

*August 18, 2005*



*Frederick K. Grittner*  
Frederick K. Grittner  
Clerk of Appellate Courts